

# EXHIBIT 2

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

FACEBOOK, INC.,

Defendant.

Case No. 1:20-cv-03590-JEB

**[PROPOSED] STIPULATED ORDER**

Upon consideration of the parties' Joint Motion for Entry of Stipulated Order, it is hereby:

**ORDERED** that the Federal Trade Commission ("FTC") may file a Substitute Amended Complaint, *nunc pro tunc*, without impacting any deadlines currently set by the Court; and it is further

**ORDERED** that the FTC shall file with the Court, within one calendar day, a wholly unredacted version of the Substitute Amended Complaint under seal; and it is further

**ORDERED** that the FTC may include in its Substitute Amended Complaint certain language that it has identified to Facebook, Inc. from the document bearing Bates numbers FB\_FTC\_CID\_02010030-035 ("Disclosed Language"); and it is further

**ORDERED** that the inclusion of the Disclosed Language is for purposes of the Substitute Amended Complaint only and, except for permitting the FTC and the Court to review and rely upon the Disclosed Language, does not waive any privilege or protection applicable to the underlying document (or similar documents) in the litigation pending before the Court or in

any other federal, state, or other proceeding, nor does it waive the privilege as to information related to the same subject matter as the Disclosed Language; and it is further

**ORDERED** that the FTC does not waive any ability to challenge any privilege or protection asserted as to the underlying document (or similar documents); and it is further

**ORDERED** that the FTC shall treat the Disclosed Language as confidential, and shall redact it in the version of the Substitute Amended Complaint filed on the public docket.

**IT IS SO ORDERED.**

DATED: September 8, 2021



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Honorable James E. Boasberg  
United States District Judge

**NAMES OF PERSONS TO BE SERVED**

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